

CARAVELLA ASSET MANAGEMENT (IFSC) PRIVATE LIMITED

PRIVACY POLICY

1. Introduction

Caravella Asset Management (IFSC) Private Limited (“Company”, “we”, “us”, or “our”) is a Registered Fund Management Entity (Non-Retail) with Registration No. IFSCA / FME /II/2023-24/106 dated March 20, 2024 and regulated by the International Financial Services Centres Authority (“IFSCA”) and operating from Gujarat International Finance Tec-City (“GIFT City”), IFSC.

We are committed to protecting the privacy and confidentiality of personal data of our investors, clients, website users, service providers, and other stakeholders in compliance with applicable laws, including but not limited to:

- (i) IFSCA (Fund Management) Regulations, 2025
- (ii) Applicable Data Protection Laws in IFSC and India
- (iii) Applicable Anti-Money Laundering (AML) and Know-Your-Customer (KYC) regulations

However no method of transmission over the internet or method of electronic storage can be deemed 100% secure. Whilst Caravella will strive to use commercially acceptable means to protect your personal identifiable information, we cannot provide any absolute guarantees.

Caravella may receive personal information through this website, or we may ask for personal information from you should you wish to discuss, consider and/or open an account with Caravella.

When you provide such personal information, we will only use it to deliver the services that you have requested. We will not use or share your information with any third party except where such sharing of information is required in order for Caravella to provide specific services to you or where such request is made by a third party who has a legal or regulatory right to request such information, this information may be shared with recipient outside of IFSC or to an international organization.

This Privacy Policy explains how we collect, use, disclose, and protect personal data.

2. Scope of Policy

This Privacy Policy applies to:

- i. Visitors to our website
- ii. Investors and Prospective investors
- iii. Clients and Counterparties
- iv. Vendors, Service Providers, and Partners
- v. Employees and representatives of the above

3. Information We Collect

Personal Identifiable Information

An individual is identified if you have distinguished that individual from others. In most cases an individual’s name may be sufficient to identify them. However, whether any potential identifier actually identifies an actual individual, depends upon the context. By itself, for example the name Mr John Smith may not always be personal data as there are, globally, many Mr John Smiths. However, where the name

is combined with other information such as an address, a place of work, a telephone number, an IP address, this will usually be sufficient to clearly identify one specific individual.

If you are a customer or a potential customer, we may collect personal information about you. Such information may include, but not be limited to:

- Name, address, telephone number, email address
- Date of birth and gender
- Profession and other employment details
- Details of your bank account, Personal Tax ID numbers,
- Source of wealth, income

We may collect the following categories of personal data:

3.1 Identification Information – Name, Date of birth, Nationality, Passport / PAN / Identification number

3.2 Contact Information – Address, Email address, Phone number

3.3 Financial Information - Bank account details, Investment history, Source of funds, Net worth information

3.4 Regulatory Information - KYC documentation, AML documentation, Tax identification numbers

3.5 Technical Information (Website) - IP address, Browser type, Device information, Cookies and usage data

4. How We Collect Information

We may collect information:

- i. Directly from clients and investors
- ii. Through onboarding forms and agreements
- iii. From regulatory filings and KYC providers
- iv. Through website cookies and analytics tools
- v. From third-party service providers
- vi. From publicly available sources
- vii. Any other source

5. Purpose of Processing Personal Data

We use personal data for the following purposes

5.1 Regulatory Compliance

- i. Compliance with IFSCA regulations
- ii. AML / KYC verification
- iii. Regulatory reporting

5.2 Investment Management Services

- i. Managing investment portfolios and funds
- ii. Investor onboarding and administration
- iii. Processing subscriptions and redemptions

5.3 Operational Purposes

- i. Maintaining internal records
- ii. Risk management
- iii. Audit and compliance

5.4 Legal Obligations

- i. Compliance with applicable laws and regulations
- ii. Legal proceedings or regulatory investigations

6. Legal Basis for Processing

We may process personal data based on:

- i. Legal and regulatory obligations
- ii. Contractual obligations
- iii. Legitimate business interests
- iv. Consent, where applicable

7. Sharing and Disclosure of Personal Data

We may share personal data with:

- i. IFSCA and regulatory authorities
- ii. Custodians, administrators, auditors, and legal advisors
- iii. Banks and financial institutions
- iv. Service providers and vendors
- v. Affiliates and group companies
- vi. Government authorities, if required by law

We ensure appropriate confidentiality and data protection safeguards.

8. Cross-Border Data Transfers

Personal data may be transferred outside India and IFSC to jurisdictions where we or our service providers operate. We shall ensure adequate safeguards and regulatory compliance for such transfers.

9. Data Retention

We may retain personal data:

- i. As long as required for regulatory and legal compliance
- ii. As necessary for business and operational purposes

- iii. As required under applicable AML, tax, and regulatory laws

Caravella will process and store the relevant personal data for the duration of the business relationship. The Company may also store the data for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations and, or for the establishment, exercise or defense of legal claims, and in general where it has a legitimate interest for doing so.

After the retention period, data will be securely deleted or anonymized.

10. Data Security

We implement appropriate security measures, including:

- i. Access controls
- ii. Encryption
- iii. Secure servers
- iv. Firewall protection
- v. Physical and electronic safeguards

11. Cookies Policy

Our website uses cookies to:

- i. Improve user experience
- ii. Monitor website performance
- iii. Enhance functionality

A cookie is an element of data that can be sent to your browser. Your browser may then store that cookie on your system based upon the preferences you may have set. Cookies gather information about your operating system including, but not limited to, browser type, Internet Protocol ('IP') address. Like many sites, Caravella may use or send cookies to collect information (a small text file containing a string of alphanumeric characters) that uniquely identifies your browser and may provide Caravella with information on how you use its Website (e.g. the pages you view, the links you click upon). Cookies may allow Caravella to track its website traffic and to identify certain personal information. A persistent cookie remains on your hard drive after you have closed your browser. Persistent cookies can be removed by following your web browsers directions. A session cookie is temporary and disappears after you close your browser.

Users may disable cookies through browser settings.

12. Rights of Data Subjects

Subject to applicable law, you may have the right to:

- i. Access personal data
- ii. Correct inaccurate data
- iii. Request deletion
- iv. Restrict processing
- v. Object to processing

- vi. Withdraw consent

Requests may be submitted to our Data Protection Officer.

13. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for their privacy practices.

Caravella's website may contain links to other sites that are hosted and/or controlled by third party's. Caravella has no control over such third party sites and accordingly accepts no responsibility or liability for the manner in which such third party may treat your personal information. You should therefore ensure you familiarise yourself with that third party's own Privacy Policy before providing any personal information.

14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Updates will be posted on our website.

15. Your Rights

Your rights

You have the following rights:

- Access to Your Information

You have the right to access the personal information that the Company holds about you at any time.

- Rectification Of Your Personal Information

You have the right to ask the Company to update and correct any out-of-date or incorrect personal information that we would hold about you.

- Right to erasure

You have the right to ask the Company to erase your personal information, to the extent that the Company has no legal and/or regulatory obligations to keep such personal information.

- Restriction on Processing of Your Personal Information

You have the right to ask the Company to restrict the processing of your personal information in case:

- a. You contested the accuracy of the personal information held by the Company;
- b. The processing is unlawful, but you objected to the deletion of the personal data and requests the restriction of the use instead;
- c. The Company no longer needs the personal data for the purposes of the processing, but you require them for legal reasons;
- d. You objected to processing and the Company is investigating whether there are legitimate grounds to override your objection.

- Data Portability

You may ask the Company to provide you with a copy of the personal information that the Company holds about you.

- Object

You have the right to object at any time to the processing of your personal data for any direct marketing (and related profiling) by the Company.

- Automatic Decision Making

The Company does not make decisions by purely automatic means, but if we do, you have the right to object, if it is not necessary for entering into, or performing of, a contract between you and Caravella.

If you wish to exercise any of the above rights, you can contact the Company using the below contact details.

In addition, you have the right to lodge a complaint with The International Financial Services Centres Authority (IFSCA) with respect to the way the Company is processing your personal data or the way the Company is handling your rights.

16. Contact Details

Data Protection Officer

Should you have any questions or comments regarding this Privacy Policy, please contact

Jalaj Nagar

Caravella Asset Management (IFSC) Private Limited

UNIT no. GA-34, Ground Floor, Pragya Accelerator, Block 15, Road 11, Gift City, Gandhinagar 382050

Email: jalaj@caravella.in

Phone: 9081255887

17. Consent

By using our website or services, you consent to this Privacy Policy.